

December 8, 2025

2025 DEC -8 AM 10: 57

Members of the Bristol Planning Board  
Town of Bristol  
Town Hall  
10 Court Street  
Bristol, RI 02809

RE; Proposed Gooding Avenue Hotel  
STORMWATER MANAGEMENT REPORT

Dear Members of the Bristol Planning Board

I have reviewed the March 27, 2025 Stormwater Management Report by Kendar (D&M BOCA Development LLC) for the Master Plan submission. On behalf of local residents, we respectfully request that the Planning Board deny the approval of the Master Plan for the Major Land Development. It is my opinion that the report is incomplete and contains inaccurate information, resulting in unsupported conclusions concerning the impact of the proposed Hotel on downstream flooding.

**The facts are:**

- There is a bad flooding problem downstream of the proposed development that affects neighborhoods, Mount Hope High School, Gooding Avenue, Chestnut Street and Hope Street.
- The flooding issue is a concern of the neighborhood and Town, as expressed in the Petition signed by over 100 residents, and 35 opposition letters to RIDEM granting a wetland alteration permit.
- One of the major functional values of wetlands is flood storage and mitigation of downstream flooding.
- The Town of Bristol had commissioned a flood study, *Silver Creek Drainage Study*, Bristol, RI (Beta Engineers-Scientists, November 2007) to identify the flooding problem and recommend mitigation measures
- The Petition signatures have expressed their belief that flooding has increased since the Applicant cleared the hotel site in 2018.

**The Applicant needs to seriously consider the potential impacts of their development by completing a comprehensive and sincere assessment. This assessment needs to include:**

- ❖ Using **the appropriate infiltration rate (lower)** as identified by the National Resources Conservation Service (NRCS). Also, the effect of sea level rise on increasing flood level elevations needs to be considered.
- ❖ **Revising the *HydroCAD* Stormwater model** to incorporate the appropriate infiltration rate.
- ❖ **A flood analysis of the downstream effects** of the proposed development on the already programmatic flooding problem by using the appropriate method developed by the Army Corps of Engineers and utilized by Beta in their *Silver Creek Drainage Study* to determine the impact of filling in wetlands on downstream flooding.

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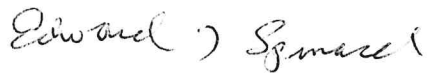
- ❖ An assessment of the potential of **coincidental peaks that could occur downstream of the hotel**

Due to the technical nature of my findings on the Applicant's Stormwater Management Report, I am creating a PowerPoint presentation with visuals to clarify the main deficiencies. These issues indicate that current flooding concerns remain unaddressed, particularly since the Applicant has not evaluated how wetland filling affects downstream flooding. It is therefore reasonable to conclude that flooding will likely increase.

Master Plan approval should not be granted for the proposed Hotel due to missing or inaccurate details. I am prepared to speak and answer questions at the Public Meeting.

Thank you for your consideration of this request.

Sincerely:



Edward J. Spinard  
Dartmouth Street, Bristol, RI